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and LG Electronics, Inc.

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Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE

CARRIER IQ, INC.,

CONSUMER PRIVACY LITIGATION

[This Document Relates to Case Nos. 3:11-cv-
06199-EMC; 3:11-cv-06641-EMC]

Case No.: 3:12-md-02330-EMC

STIPULATION RE RESPONSIVE PLEADING
DEADLINE FOR DEFENDANT LG
ELECTRONICS, INC.

WHEREAS Defendant LG Electronics, Inc. ("LG Korea") was served with the Summons and First Consolidated Amended Complaint in the above-captioned matter on October 24, 2014, and its current deadline to respond to the Complaint is November 14, 2014;

WHEREAS the Complaint has been superseded by a Second Consolidated Amended Complaint to which the other Defendants to this lawsuit filed a Motion to Dismiss. That Motion was heard by the Court on September 18, 2014, and has been under submission for a decision since that date;

WHEREAS a mediation took place in this case on November 12, 2014 and a second mediation session is set for December 16, 2014;

WHEREAS the parties hereto agree that it would be most efficient for LG Korea to respond to the operative version of the Complaint, if and when its subsidiary LG Electronics MobileComm USA, Inc. is required to respond to that version of the Complaint, which will depend on what claims survive the Motion to Dismiss and whether a Third Amended Complaint is filed;

THEREFORE, IT IS STIPULATED AND AGREED AS FOLLOWS:

Defendant LG Korea shall respond to the operative version of the Complaint in this action, if any, if and when defendant subsidiary LG Electronics MobileComm USA, Inc. is required to respond to that same version of the Complaint. Nothing herein shall be construed as a waiver of any of LG Korea's defenses or as limiting the manner in which LG Korea may respond to the operative Complaint.

DATED: December 11, 2014

GREENBERG TRAURIG, LLP

By: /s/ Jeff E. Scott

Jeff E. Scott

Attorneys for Defendants LG Electronics MobileComm U.S.A., Inc. and LG Electronics, Inc.

DATED: December 11, 2014

PEARSON SIMON & WARSHAW, LLP

By: /s/ Daniel L. Warshaw

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Plaintiffs' Interim Co-Lead Counsel

I, Daniel L. Warshaw, am the ECF user whose ID and password are being used to file this *Stipulation re Responsive Pleading Deadline for Defendant LG Electronics, Inc.* In compliance with Local Rule 5-1(i)(3), I hereby attest that the concurrence of the filing of this document has been obtained from the other signatories indicated by a conformed signature (/s/) within this document.

DATED: December 11, 2014

By: /s/ Daniel L. Warshaw
Daniel L. Warshaw

~~[PROPOSED]~~ ORDER

Pursuant to stipulation, it is SO ORDERED.

December 16, 2014

Dated: _____

